

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

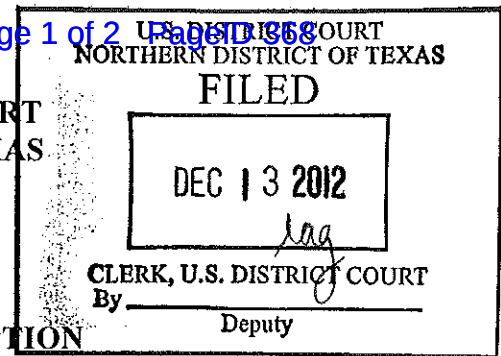
H. OLIVIA LORD,
Plaintiff,

VS.

DWAYNE A. THOMPSON,
Defendant.

§
§
§
§
§
§
§

CIVIL ACTION
NO. 3:11-CV-3241-M
(ECF)



AGREED PROTECTIVE ORDER

On or about October 26, 2012, Plaintiff H. Olivia Lord, by and through her counsel of record served a subpoena upon the Records Custodian of the Dallas County District Attorney's Office ("the DA") for the DA's entire file, including but not limited to, all reports, records, memos, witness statements, photographs, emails, etc. relating to the case entitled *State of Texas v. O. Hephzibah Lord*, No. F10-56637-X in the District Court of Dallas County, Texas. All proceedings in this State criminal case have now been terminated and the case is officially closed.

Counsel for Plaintiff and Defendant have both been afforded an opportunity to review the records contained in the DA's file and have agreed to the disclosure of certain records to them as discovery in this pending civil case.

Accordingly, the parties respectfully request the Court to enter a protective order which allows the DA to produce these records to them pursuant to their agreement.

After careful consideration of this matter and further noting the agreement of the parties and the DA, the Court finds that the following Order should be issued.

IT IS THEREFORE ORDERED that DA shall produce the designated records contained in the DA's file in accordance with the agreement of the parties within ten (10) days from the date of this Order.

IT IS FURTHER ORDERED that the designated records shall not be disseminated to any person other than the parties and their counsel of record in this suit without the express written permission of the Court. It shall only be necessary to obtain such permission from the Court if any party and/or the DA serves a written objection upon the party requesting disclosure within five (5) business days after receiving written notice of an intent to disseminate any of the designated records.

IT IS FURTHER ORDERED that the limited production of these records to the parties herein shall not constitute or be construed as a waiver of any applicable privilege asserted by any of the parties or the DA with regard to any documents and/or other materials in this or any other action.

SO ORDERED.

Signed this 13 day of December 2012.


UNITED STATES DISTRICT JUDGE

APPROVED AS TO FORM AND CONTENT:

/s/ Don Tittle
DON TITTLE
TEXAS BAR NO. 20080200
Law Offices of Don Tittle, PLLC
6301 Gaston Ave., Suite 440
Dallas, TX 75214
(214) 522-8400 – Telephone
(214) 389-1002 – Fax

Attorney for Plaintiff

/s/ Tatia R. Wilson
TATIA R. WILSON
TEXAS BAR NO. 00795793
Assistant City Attorney
Dallas City Attorney's Office
1500 Marilla St., 7CN
Dallas, TX 75201
(214) 671-9553 – Telephone
(214) 670-0622

Attorney for Defendant

/s/ Peter L. Harlan
PETER L. HARLAN
TEXAS BAR NO. 09011300
Assistant District Attorney
Frank Crowley Courts Bldg.
133 N. Riverfront Blvd., LB 19
Dallas, TX 75207
(214) 653-3691 – Telephone
(214) 653-2899 – Fax

Attorney for the District Attorney's Office